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Hearing Date: April 14, 2010  
Objection Deadline: March 31, 2010

-and-

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Attorneys for BlueMountain Capital Management, LLC and Affiliated Entities

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

**LEHMAN BROTHERS HOLDINGS INC., et**  
*al.*

Debtors.

Chapter 11

Case No. 08-13555(JMP)

(Jointly Administered)

**JOINDER OF BLUEMOUNTAIN CAPITAL MANAGEMENT, LLC AND AFFILIATED  
ENTITIES TO OPTIM ENERGY MARKETING AND TRADING LLC'S OBJECTION  
TO DEBTORS' MOTION PURSUANT TO SECTION 105 OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULE 9014, AND GENERAL  
ORDER M-390 AUTHORIZING THE DEBTORS TO IMPLEMENT  
CLAIMS HEARING PROCEDURES AND ALTERNATIVE DISPUTE  
RESOLUTION PROCEDURES FOR CLAIMS AGAINST DEBTORS**

BlueMountain Capital Management, LLC, on behalf of itself and certain of its affiliates who have filed proofs of claim in the Debtors' chapter 11 cases (collectively, "BlueMountain"), by and through its counsel, Lowenstein Sandler PC, submits this joinder to Optim Energy Marketing and Trading LLC's objection (the "Optim Objection") [Docket No. 7939] to the Debtors' Motion Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and

General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors (the "Motion").<sup>1</sup>

1. BlueMountain has filed various proofs of claims (the "Claims") in the Debtors' chapter 11 cases. The Claims are based on derivative contracts or guarantees of liabilities arising under derivative contracts.

2. BlueMountain objects to the Motion for the reasons contained in the Optim Objection and hereby joins in the Optim Objection and incorporates by reference the arguments contained therein and reserves the right to join in all other objections to the Motion.

3. Accordingly, BlueMountain respectfully requests that the Court deny the Motion.

Dated: Roseland, New Jersey  
March 31, 2010

**LOWENSTEIN SANDLER PC**

By: /s/ Paul Kizel  
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<sup>1</sup> All capitalized terms contained herein shall have the meaning ascribed to them in the Motion.